<u>REMARKS/ARGUMENTS</u>

Claims 1-21, 23-25 and 27-38 are pending in this application. By this Amendment, claims 1, 13, 18, 23, 25, 32-33 and 35-36 are amended, claim 22 is canceled without prejudice or disclaimer, and claims 37-38 are added. Reconsideration in view of the above amendments or the following remarks is respectfully requested.

A.   The Office Action rejects claims 1-36 under 35 U.S.C. §103(a) over U.S. Patent No. 6,272,545 to Flanagin et al. (hereafter "Flanagin") and U.S. Patent Publication No. 2004/0139076 to Pendleton. Since the references, individually or in combination, fail to disclose or suggest features recited in the claims, the rejection is respectfully traversed.

(1)   Applicant respectfully submits that it would not have been obvious to one of ordinary skill in the art to combine Flanagin with Pendleton. Applicant respectfully submits that Flanagin discloses a mobile device 3A which, for example, could be a desktop assistant, PDA, palm top computer, phone or pager, personal information manager (PIM). See column 1, lines 31-45, column 6, lines 25-45, column 12, lines 49-58 and Figures 3-4. The mobile device 3A can include operating system 98, application programs 5A-5C for example in memory 90. As such, the mobile devices are small electronic computing devices with limited size, weight and memory and computing power. See column 1, lines 31-45 of Flanagin.

In contrast, Pendleton discloses service providers 4, 6, 8 such as a hospital or doctor's office, individually entering and remotely transferring information over the internet 20 to insurers 14, 16, 18 that are located in separate physical locations via server 22. A medical service provider has complex data keeping requirements to legally satisfy and may have a complicated database stored on a general purpose computer with records

for each patient treated and accordingly can include data for millions of patients. Insurers include information on all insured patients including coverage information and individual transactions regarding that patient that must also satisfy complex legal data keeping requirements. The server 22 includes a complex system to receive information from remote medical service providers for conversion and then transmission to a remote insurer. As such, Applicant respectfully submits that even individually, the processing requirements and scope of information used by the service providers 4, 6, 8 or the server 22 or the insurers 14, 16, 18 would not be capable of operating on a PIM. Accordingly, Applicant respectfully submits it would not be obvious to combine Pendleton and Flanagin as asserted in the Office Action. Further, Applicant respectfully submits that one of ordinary skill in the art would not consider a complex system disclosed in Pendleton as capable of operating small electronic computing devices with limited size, weight and memory and computing power disclosed in Flanagin. Applicant does not see any disclosure in Pendleton how to simplify any of the complex individual components or the networking capability to modify such capabilities to a PIM.

(2)   Further, Applicant respectfully submits that even if Flanagin and Pendleton had been combined, the combination would not have resulted in features recited in the claims. With respect to claim 1, for example, Applicant respectfully submits that Flanagin and Pendleton, individually or in combination would not result in at least features of a method for storing data in a personal information terminal (PIT) including composing data in a first application program of a plurality of application programs embedded in the PIT, the data being of a first format, converting a format of the composed data from the first format to a second format suitable for a second application program, and storing the

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format-converted data in a database associated with the second application program, wherein each of the plurality of application programs is selectively operated in the PIT as recited in claim 1.

The Office Action admits Flanagin does not teach converting a format from a first format to a second format suitable for a selected second application program and storing the format-converted data in a database associated with the second application. See Item 4 on lines 1-3 of page 3 of the Office Action.

The Office Action asserts Pendleton discloses converting a format from a first format to a second format citing paragraphs 1, 6, 10 and 26-28 of Pendleton. However, Applicant respectfully submits Pendleton does not teach or suggest converting a format of the composed data from the first format to a second format, wherein each of the plurality of application programs is selectively operated in the personal information terminal and combinations thereof as recited in claim 1. In contrast, Applicant respectfully submits that Pendleton discloses the medical service providers 4, 6, 8 enter data at their physical location where the medical services are being provided. Similarly, the insurers enter the data where the insurance processing is being performed. Finally, Pendleton discloses that such locations are remote and are connected over internet 20 via server 22. Thus, Applicant respectfully submits that Pendleton does not teach or suggest any modification to its disclosure that would result in at least features of composing data in a first application program, converting a format of the composed data from the first format to a second format, wherein each of the plurality of application programs is selectively operated in the personal information terminal and combinations thereof as recited in claim 1.

With respect to claim 18, Applicant respectfully submits that Flanagin and Pendleton, individually or in combination, would not result in at least features of converting a format of the composed data to a second format used by the second application program, wherein the first application program is a document editing program, and the second application program is one of a contact manager, an appointment scheduler, a telephone organizer and a task list and combinations thereof as recited.

The Office Action admits that Flanagin does not teach or suggest converting a format of the composed data. Pendleton discloses converting data from a medical service provider format to an insurer format. Applicant respectfully submits that Pendleton does not disclose converting composed data, wherein the data is composed in a document editing program.

With respect to claim 33, Applicant respectfully submits that Flanagin and Pendleton would not result in at least features wherein contents of the data entered in the first application program in the PDA are stored as re-formatted data in the second database in the PDA to match the second database to the first database while the first application program is executed. Applicant respectfully submits that in Pendleton the data entry by the service provider in an application program would necessarily be terminated to transmit data via the internet 20 to the server 22.

With respect to claims 9, 31 and 32, the Office Action asserts it is notoriously well known in the database art at the time of the information for delimiters to be used in databases. Applicant notes that claim 9 depends from claim 7 that recites composing data in the first application block, selecting a data block in the composed data. Further, claim

9 recites wherein a delimiter between portions of data in the data block indicate a new data field. Thus, Applicant respectfully submits that claim 9 recites features of a delimiter with respect to a data block in a first application for converting to a second application program and combinations thereof as recited.

Thus, the Office Action appears to take official notice, without providing support from a secondary reference that "wherein a delimiter between portions of data in the data block indicate a new data field" and combinations thereof as recited in claim 9 is old and well known in the art. See page 6 of the Office Action. As required under MPEP §706.02(a), Applicant respectfully requests production of a second reference to support such a conclusion. If the secondary reference is not available, then the rejection must be based on facts within the personal knowledge of the Examiner. If this is true, Applicant respectfully requests an affidavit from the Examiner with data stated as specifically as possible, in accordance with MPEP §2144.03(c). If neither a second reference or affidavit can be produced, the rejection fails to meet the <u>prima facie</u> case of obviousness.

For at least the reasons set forth above, Applicant respectfully submits claims 1, 18 and 33 define patentable subject matter. Claims 13, 25 and 36 define patentable subject matter for at least reasons similar to claim 1. Claims 2-12, 14-17, 19-21, 23-24, 26-32 and 34-35 depend from claims 1, 13, 18, 25 and 33, respectively, and therefore also define patentable subject matter for at least that reason as well as their additionally recited features. Claim 22 is canceled without prejudice or disclaimer. Withdrawal of the rejection of claims 1-36 under §103 is respectfully requested.

B.   Claims 37-38 are newly added by this Amendment and believed to be in condition for allowance.

CONCLUSION

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. Favorable consideration and prompt allowance are earnestly solicited.

If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, **Carl R. Wesolowski,** at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,
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